

August 11, 2005

Arthur Neal
 Director, Program Administration
 National Organic Program
 USDA-AMS-TMO-NOP
 1400 Independence Ave., SW Room 4008
 So. Ag. Stop 0268
 Washington, D.C. 20250

Re: docket Number TM-04-07, National Organic Program Sunset Review

Dear Mr. Neal,

BTSA is a manufacturer of non GMO mixed tocopherols and Vitamin E. Our products are sold to companies in the organic food industry in the U.S.. Tocopherols have important technical functions in the formulations of their products. The remaining materials listed below are important in the formulation of our products. We support the continuation of Tocopherols, and the ingredients listed below, on the National List.

<u>Name</u>	<u>Use</u>	<u>Comments, relevant information</u>
205.695(a) Non Synthetic allowed		
Calcium Carbonate	Used as a carrier to facilitate production of powdered forms of tocopherols	A mineral, naturally derived. Adsorption of tocopherol liquid by calcium carbonate is a physical adsorption process, involving no chemical changes to either the carrier or the tocopherols. Water dispersible. Free flowing.
Kaolin	Used as a carrier to facilitate production of powdered forms of tocopherols	A mineral, naturally derived. Adsorption of tocopherol liquid by kaolin is a physical adsorption process, involving no chemical changes to either the carrier or tocopherols. Water soluble.
<u>205.605(b) Synthetics allowed</u>		



Tocopherols	Used to postpone the onset of rancidity in fat/oils & foods containing fat/oils, such as extruded cereals, snack foods & pre-cooked foods. Effective antioxidant at very low concentrations, over a wide range of fat/oils.
Silicon dioxide	Used as a carrier to facilitate production of powdered forms of tocopherols. An inert carrier. Adsorption of tocopherol liquid by silicon dioxide is a physical adsorption process, involving no chemical changes to either the carrier or the tocopherols. Water & oil soluble. Highly absorptive.
Sodium hydroxide	pH adjustment

205.606 Non organic agricultural ingredients

Gum arabic	Used as a carrier to facilitate production of powdered forms of tocopherols. An inert carrier. Adsorption of tocopherol liquid by gum arabic is a physical adsorption process, involving no chemical changes to either the carrier or the tocopherols. Water soluble. Not free flowing.
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Sincerely,

Susan Smiley

*Susan Smiley
North American Sales Manager
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